

McCORRISTON MILLER MUKAI MacKINNON LLP

DAVID J. MINKIN 3639-0  
COURTNEY K. SUE-AKO 9803-0  
Five Waterfront Plaza, 4<sup>th</sup> Floor  
500 Ala Moana Boulevard  
Honolulu, Hawai‘i 96813  
Telephone: (808) 529-7300  
Facsimile: (808) 524-8293  
[minkin@m4law.com](mailto:minkin@m4law.com)  
[sue-ako@m4law.com](mailto:sue-ako@m4law.com)

Attorneys for Defendant  
MUNICIPAL SERVICES BUREAU

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

REED SAILOLA,	)	CIVIL NO. 13-00544 HG RLP
	)	
Plaintiff,	)	DEFENDANT MUNICIPAL
	)	SERVICES BUREAU’S INITIAL
vs.	)	DISCLOSURES; CERTIFICATE
	)	OF SERVICE
MUNICIPAL SERVICES BUREAU and	)	
JOHN DOES 1-50,	)	
	)	
Defendants.	)	
	)	
	)	

---

DEFENDANT MUNICIPAL SERVICES  
BUREAU’S INITIAL DISCLOSURES

Defendant MUNICIPAL SERVICES BUREAU (“Defendant”), by and  
through its attorneys, McCorriston Miller Mukai MacKinnon, LLP, hereby submits

the following as its Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

**I. WITNESSES**

Based on the information reasonably available at this time, Defendant believes that the following individuals may have discoverable information relevant to Defendant's defenses to the claims asserted by Plaintiff REED SAILOLA ("Plaintiff"):

1. Aaron Million  
c/o McCorriston Miller Mukai MacKinnon, LLP  
Five Waterfront Plaza, 4th Floor  
500 Ala Moana Boulevard  
Honolulu, Hawai'i 96813

Subject(s) of knowledge: All issues relevant to alleged liability and damages and the referral of the underlying State court judgment.

Defendant also identifies any and all witnesses identified by Plaintiff in this litigation as well as all necessary rebuttal witnesses and custodians of records to authenticate documents and things. Defendant reserves the right to identify other persons with non-privileged knowledge to support its defenses in this matter as are revealed in the course of ongoing investigation and discovery.

**II. IDENTIFICATION OF DOCUMENTS**

Defendant identifies the following categories of documents they have in their possession, custody, or control that may be relevant to the disputed facts:

1. All pleadings in the lawsuit underlying Plaintiff's claims; and
2. All documents and records of Municipal Services Bureau, related to the collection of moneys from Plaintiff.

Defendant reserves the right to amend and supplement this disclosure as necessary.

### **III. COMPUTATION OF DAMAGES**

Defendant has no information as yet regarding the cost and/or damages in the underlying lawsuit.

Defendant may seek recovery of its reasonable attorneys' fees and costs in an amount to be shown at trial.

### **IV. IDENTIFICATION OF INSURANCE AGREEMENTS**

Defendant has no information as yet regarding any applicable insurance agreements pertinent to the underlying lawsuit.

### **V. LIMITATIONS**

Nothing in these Initial Disclosures shall constitute a waiver of any claim, whether procedural or substantive, including: any applicable privilege, including the attorney-client privilege, the work-product doctrine, or any other privilege; and the right to object to discovery requests that are not relevant or sufficiently relevant to justify the burden or expense of response.

Nothing in these Initial Disclosures shall constitute an admission or concession on the part of Defendant with respect to any issues of fact or law.

Pursuant to Rule 26(g)(1) of the Federal Rules of Civil Procedure, the undersigned certifies that, to the best of his or her knowledge, information, and belief, formed after a reasonable inquiry, this Initial Disclosure is complete and correct.

DATED: Honolulu, Hawai'i, December 30, 2013

/s/ David J. Minkin  
DAVID J. MINKIN  
COURTNEY K. SUE-AKO

Attorneys for Defendant  
MUNICIPAL SERVICES BUREAU

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

REED SAILOLA,	)	CIVIL NO. 13-00544 HG RLP
	)	
Plaintiff,	)	CERTIFICATE OF SERVICE
	)	
vs.	)	
	)	
MUNICIPAL SERVICES BUREAU and	)	
JOHN DOES 1-50,	)	
	)	
Defendants.	)	
	)	
	)	
	)	
	)	
	)	

---

CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES that on this date, a copy of the foregoing document was duly served upon the following persons either by electronic court filing (ECF), hand delivery (HD) or by mailing said copy, postage prepaid, first class, in a United States post office at Honolulu, Hawaii (M), in the manner indicated, addressed as set forth below:

**Served Electronically through CM/ECF:**

RICHARD HOLCOMB, ESQ.

[rholcomblaw@live.com](mailto:rholcomblaw@live.com)

BRIAN J. BRAZIER, ESQ.

[brianbrazier@gmail.com](mailto:brianbrazier@gmail.com)

JUSTIN A. BRACKETT, ESQ.

[justinbrackettlaw@gmail.com](mailto:justinbrackettlaw@gmail.com)

Attorneys for Plaintiffs

DATED: Honolulu, Hawai'i, December 30, 2013

/s/ David J. Minkin

DAVID J. MINKIN

COURTNEY K. SUE-AKO

Attorneys for Defendant

MUNICIPAL SERVICES BUREAU